

EXHIBIT 2

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4
5)
6 In re: FLINT WATER CASES) Civil Action No.
7) 5:16-cv-10444-JEL-MKM
8) (consolidated)
9)
10)
11) Hon. Judith E. Levy
12) Mag. Mona K. Majzoub
13)
14)
15 HIGHLY CONFIDENTIAL
16 CONTINUED REMOTE VIDEOTAPED DEPOSITION OF
17 WILLIAM FAHEY
18 Tuesday, October 27, 2020
19 VOLUME III
20 Continued remote videotaped deposition of
21 WILLIAM FAHEY, conducted at the location of the
22 witness in Boston, Massachusetts, commencing at
23 10:03 a.m., on the above date, before Carol A. Kirk,
24 Registered Merit Reporter, Certified Shorthand
 Reporter, and Notary Public.

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1 A. I was a participant on the
2 go/no-go, yes, and I said, "Go."

3 Q. Okay. So if Veolia could do it
4 all again, you had a chance to do this work for
5 the City of Flint again, is there anything at
6 all that Veolia would do differently?

7 MR. MCELVAINE: Objection.

8 Mr. Connors, are you getting to a
9 document that was produced subsequent to
10 Mr. Fahey's original deposition, sir?

11 MR. CONNORS: Of course I am.

12 BY MR. CONNORS:

13 Q. Mr. Fahey, can you answer the
14 question?

15 MR. MCELVAINE: Okay. Get there
16 sooner rather than later.

17 Mr. Fahey, you can answer.

18 A. Based on what I've learned on all
19 this, I would have been a no go on doing
20 business with the City of Flint.

21 Q. Okay. And in terms of once you
22 agreed to perform this work for the city and
23 you're under contract with them to be their
24 water quality consultant, is there anything that

1 Veolia would have done differently if they had a
2 chance to do it again?

3 MR. MCALVAINE: Objection.

4 You can answer, Mr. Fahey.

5 A. I believe our report was a good
6 report. We made sound recommendations. The
7 fact that the regret we have is that we can't
8 force cities and towns to implement
9 recommendations. So they should have listened.

10 Q. Okay. So I hear you casting blame
11 on the city.

12 Is there anything at all Veolia
13 would have done differently? And if the answer
14 is no, that's fine. I'm just asking.

15 MR. MCELVAINE: Objection.

16 You can answer.

17 A. I mean, I think we did a good job
18 for the city, so no. We did our job.

19 Q. Okay.

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21 (Fahey Deposition Exhibit 40 marked.)

22 — — —

23 BY MR. CONNORS:

24 Q. Exhibit 40 is Bates-labeled

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CERTIFICATION

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3 I, Carol A. Kirk, Registered Merit Reporter and
4 Certified Shorthand Reporter, do hereby certify that
5 prior to the commencement of the examination,
6 WILLIAM FAHEY was duly remotely sworn by me to
7 testify to the truth, the whole truth, and nothing but
8 the truth.

9 I DO FURTHER CERTIFY that the foregoing is a
10 verbatim transcript of the testimony as taken
11 stenographically by me at the time, place, and on the
12 date hereinbefore set forth, to the best of my
13 ability.

14 I DO FURTHER CERTIFY that I am neither a
15 relative nor an employee nor attorney nor counsel of
16 any of the parties to this action, and that I am
17 neither a relative nor employee of such attorney or
18 counsel, and that I am not financially interested in
19 the action.

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22 Carol A Kirk

Carol A. Kirk, RMR, CSR
23 Notary Public

Dated: November 10, 2020

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